

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,
v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Movant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and Bernard L.
Madoff,

Plaintiff,

v.

THE LAWRENCE J. RYAN AND THERESA R.
RYAN REVOCABLE LIVING TRUST, THE
LAWRENCE J. RYAN BY-PASS TRUST
UNDER DECLARATION OF TRUST DATED,
11/20/1991, and THERESA R. RYAN, individually
and in her capacities as trustee of THE LAWRENCE
J. RYAN AND THERESA R. RYAN REVOCABLE
LIVING TRUST
and THE LAWRENCE J. RYAN BY-PASS TRUST
UNDER DECLARATION OF TRUST DATED
11/20/1991,

Defendants

Adv. Pro. No.: 10-05124 (SMB)

**DECLARATION OF NICHOLAS J. CREMONA IN SUPPORT OF
MOTION TO STRIKE DEFENDANTS' ANSWER**

I, Nicholas J. Cremona, hereby declare as follows:

1. I am a partner at Baker & Hostetler LLP, counsel for Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-lll, and the chapter 7 estate of Bernard L. Madoff. I submit this Declaration in further support of the Trustee’s Motion to Strike Defendants’ Answer.

2. Attached hereto as Exhibit A is a true and correct copy of February 21, 2020 email correspondence between Ms. Carlisle of Baker Hostetler and Defendant Theresa Ryan and her son, Daniel Ryan, regarding Your Honor’s February 21, 2020 Order granting Chaitman LLP’s application to withdraw as counsel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 2, 2021
New York, New York

Respectfully submitted,

BAKER & HOSTETLER LLP

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